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 Limited, and Philips do Brasil Ltda.*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

) Case No. 07-5944-SC
)
) MDL No. 1917
)

This Document Relates to:
All Indirect Purchaser Actions

**DECLARATION OF TIFFANY B. GELOTT
 IN SUPPORT OF KONINKLIJKE PHILIPS
 N.V.'S, PHILIPS ELECTRONICS NORTH
 AMERICA CORPORATION'S, PHILIPS
 TAIWAN LIMITED'S, AND PHILIPS DO
 BRASIL LTDA.'S NOTICE OF MOTION
 AND MOTION FOR SUMMARY
 JUDGMENT AGAINST INDIRECT
 PURCHASER PLAINTIFFS WHO ARE
 NATURAL PERSONS RESIDING IN
 CALIFORNIA**

) Date: February 6, 2015
) Time: 10:00 a.m.
) Place: Courtroom 1
)

) Hon. Samuel P. Conti
)

1 I, Tiffany Gelott, declare and state as follows:

2 1. I am an attorney with Baker Botts LLP, attorneys for Koninklijke Philips N.V., Philips
3 Electronics North America Corporation, Philips Taiwan Limited, and Philips do Brasil Ltda
4 (collectively, the “Philips defendants”) in the above-captioned action. I am a member of the bar of the
5 District of Columbia and have been admitted to practice before this Court on this matter pro hac vice.
6 I make this declaration in support of Defendants’ Notice of Motion and Motion for Summary
7 Judgment Against Indirect Purchaser Plaintiffs Who Are Natural Persons Residing In California. The
8 information contained herein is based on my own personal knowledge, and if called as a witness I
9 could, and would, testify competently that the matters set forth herein are true.

10 2. Attached hereto as Exhibit A is a true and correct copy of the November 8, 2011
11 Complaint filed in *State of California, et al. v. Samsung SDI Ltd., Co., et al.*, San Francisco Superior
12 Court Case No. CGC-11-515784.

13 3. Attached hereto as Exhibit B is a true and correct copy of the May 11, 2012 Amended
14 Complaint filed in *State of California, et al. v. Chunghwa Picture Tubes, et al.*, San Francisco Superior
15 Court Case No. CGC-11-515786.

16 4. Attached hereto as Exhibit C is a true and correct copy of the April 11, 2012 Settlement
17 Agreement between Philips Electronics North America Corporation and the Attorney General of
18 California, on behalf of the State of California and its state agencies, its political subdivisions and
19 public agencies, and as *parens patriae* on behalf of all natural persons, in *State of California, et al. v.*
20 *Chunghwa Picture Tubes, et al.*, San Francisco Superior Court Case No. CGC-11-515786.

21 5. Attached hereto as Exhibit D is a true and correct copy of the June 12, 2013 Order
22 Granting Preliminary Approval of Settlement, Certifying Class, and Approving Form of Class and
23 Parens Notices and Setting Final Fairness Hearing Date in *State of California, et al. v. Chunghwa*
24 *Picture Tubes, et al.*, San Francisco Superior Court Case No. CGC-11-515786.

25 6. Attached hereto as Exhibit E is a true and correct copy of the December 9, 2013 Order
26 Granting Final Approval of the Chunghwa and Philips Settlements and Awarding Attorneys’ Fees,
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1 entered in *State of California, et al. v. Chunghwa Picture Tubes, et al.*, San Francisco Superior Court
2 Case No. CGC-11-515786.

3 I declare under penalty of perjury that the foregoing is true and correct to the best of my
4 knowledge and information.

5 Executed on November 7, 2014 in Washington, D.C.

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7 /s/ Tiffany B. Gelott

8 Tiffany B. Gelott
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